

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
DAYTON DIVISION**

JOHN AND JANE DOE NO. 1, et al	:	CASE NO: 3:22-cv-00337
	:	
PLAINTIFFS,	:	JUDGE MICHAEL J. NEWMAN
	:	
vs.	:	
	:	
BETHEL LOCAL SCHOOL DISTRICT	:	
BOARD OF EDUCATION, et al	:	
	:	
Defendants.	:	

**MOTION FOR LEAVE TO MANUALLY FILE VIDEOTAPED
BOARD WORK SESSION MEETING RECORDING IN SUPPORT OF DEFENDANTS’
MOTION IN LIMINE, TO STIRKE AND TO REMOVE FROM DOCKET BY PLACING
UNDER SEAL FORMER BOARD OF EDUCATION MEMBER JESSICA FRANZ’S
DECLARATION**

Defendants Bethel Local School District Board of Education, and Lydda Mansfield, Lori Sebastian, Natalie Donahue, Danny Elam, Jacob King and Matthew Chrispin, in their official capacities (“collectively referenced as “BOE Defendants”), move the Court for an Order for leave to manually file the video meeting minutes for the December 7, 2021 work session meeting in support of their Motion in Limine. All counsel were contacted as to the filing of this motion and none oppose. This motion is made in good faith and fully supported by the attached memorandum.

Respectfully submitted,

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MEMORANDUM

Defendants BOE held a work session board meeting on December 7, 2021, at which an executive session is conducted, to consider the appointment, employment, dismissal, discipline, promotion, demotion, or compensation of an employee or official, or the investigation of charges or complaints against an employee, official, licensee or student, unless the employee, official, licensee or student requests a public hearing, to conference with the board's attorney to discuss matters which are the subject of pending or imminent court action and to discussion specialized details of security arrangements. The December 7, 2021 agenda and meeting minutes have been filed with the Declaration of Tina Hageman in support of Defendants BOE's Motion in Limine. Defendants BOE respectfully request leave of Court to file the video recording minutes to provide a full record of how the meeting is documented as it pertains to the Motion in Limine. All counsel were contacted as to the filing of this motion and none oppose.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of February, 2023, I served the foregoing, via the Court's CM/ECF E-filing System which will send notification to the following:

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